Southern Nuclear

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OCT 0 8 2021

Docket No.: 52-025

ND-21-0886
10 CFR 52.99(c)(1)

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
ITAAC Closure Notification on Completion of ITAAC C.2.6.09.03b [Index Number 661]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item C.2.6.09.03b [Index Number 661]. This ITAAC confirms that the protected area perimeter barrier isolation zones are equipped with intrusion detection equipment that provides the capability to detect and assess unauthorized persons and which cause concurrent alarms in both the Central Alarm Station and Secondary Alarm Station. This ITAAC also confirms that the intrusion detection and assessment equipment at the protected area perimeter remains operable from an uninterruptible power supply in the event of the loss of normal power. The closure process for this ITAAC is based on the guidance described in Nuclear Energy Institute (NEI) 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52," which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,

Stacy for Michael J. Yox

Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC C.2.6.09.03b [Index Number 661]

MJY/RLB/sfr

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Southern Nuclear Operating Company
ND-21-0886
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC C.2.6.09.03b [Index Number 661]

ITAAC Statement

Design Commitment

3.b) The isolation zones are monitored with intrusion detection equipment that provides the capability to detect and assess unauthorized persons.

4. The intrusion detection and assessment equipment at the protected area perimeter:

a) detects penetration or attempted penetration of the protected area barrier and concurrently alarms in both the Central Alarm Station and Secondary Alarm Station;

b) remains operable from an uninterruptible power supply in the event of the loss of normal power.

Inspections/Tests/Analyses

Inspections will be performed of the intrusion detection equipment within the isolation zones.

Tests, inspections or a combination of tests and inspections of the intrusion detection and assessment equipment at the protected area perimeter and its uninterruptible power supply will be performed.

Tests, inspections or a combination of tests and inspections of the intrusion detection and assessment equipment at the protected area perimeter and its uninterruptible power supply will be performed.

Acceptance Criteria

The isolation zones are equipped with intrusion detection equipment that provides the capability to detect and assess unauthorized persons.

The intrusion detection and assessment equipment at the protected area perimeter:

a) detects penetration or attempted penetration of the protected area barrier and concurrently alarms in the Central Alarm Station and Secondary Alarm Station;

b) remains operable from an uninterruptible power supply in the event of the loss of normal power.

ITAAC Determination Basis

Inspection of the intrusion detection equipment within the protected area perimeter isolation zones was performed to verify that the isolation zones at the protected area perimeter are equipped with intrusion detection equipment that provides the capability to detect and assess unauthorized persons. Tests, inspections or a combination of tests and inspections of the intrusion detection and assessment equipment at the protected area perimeter and its uninterruptible power supply were also performed to verify the intrusion detection and assessment equipment at the protected area perimeter detects penetration or attempted penetration of the protected area barrier and concurrently alarms in the Central Alarm Station (CAS) and Secondary Alarm Station (SAS), and the intrusion detection and assessment equipment at the protected area perimeter remains operable from an uninterruptible power supply in the event of the loss of normal power. The VEGP Unit 3 Plant Security System ITAACs only cover the Unit 3 plant security system design commitment scope. The CAS and SAS are common to both VEGP Unit 3 and Unit 4.

The isolation zones are equipped with intrusion detection equipment that provides the capability to detect and assess unauthorized persons.

An inspection was performed as described in ITAAC Technical Report SV3-SES-ITR-800661 Reference 1) to verify that the Unit 3 protected area perimeter isolation zones are equipped with intrusion detection equipment that provides the capability to detect and assess unauthorized persons and satisfy the applicable intrusion detection and assessment requirements of the VEGP Units 3 and 4 Physical Security Plan associated with 10 CFR 73.55(i).

The inspection performed a walkdown of the Unit 3 protected area perimeter isolation zones to confirm that the protected area perimeter isolation zones are equipped with intrusion detection equipment that is installed per approved construction drawings and provides the capability to detect and assess unauthorized persons.

The inspection results are documented in Reference 1 and verify that the Unit 3 protected area perimeter isolation zones are equipped with intrusion detection equipment that provides the capability to detect and assess unauthorized persons.

The intrusion detection and assessment equipment at the protected area perimeter detects penetration or attempted penetration of the protected area barrier and concurrently alarms in the Central Alarm Station and Secondary Alarm Station.

Testing was performed as identified in ITAAC Technical Report SV3-SES-ITR-801661 (Reference 2) to verify that the intrusion detection and assessment equipment at the Unit 3 protected area perimeter detects penetration or attempted penetration of the protected area barrier and concurrently alarms in the CAS and SAS and satisfy the applicable intrusion detection and assessment requirements of the VEGP Units 3 and 4 Physical Security Plan associated with 10 CFR 73.55(i).

The testing identified in Reference 2 tested each segment of the Unit 3 protected area perimeter intrusion detection system by crossing or disturbing the zone of detection and confirming that concurrent intrusion detection alarms are received in both the CAS and SAS. The tests then confirmed that for each intrusion detection system alarm the security video system could provide video image recording with real-time display of video images and playback of recorded video images for assessment to both CAS and SAS.

The test results are documented in Reference 2 and verify that the intrusion detection and assessment equipment at the Unit 3 protected area perimeter detects penetration or attempted penetration of the protected area barrier and concurrently alarms in the Central Alarm Station and Secondary Alarm Station.

The intrusion detection and assessment equipment at the protected area perimeter remains operable from an uninterruptible power supply in the event of the loss of normal power.

Testing was performed as identified in ITAAC Technical Report SV3-SES-ITR-802661 (Reference 3) to verify that the intrusion detection and assessment equipment at the Unit 3 protected area perimeter remained operable from an uninterruptible power supply in the event of the loss of normal power and satisfy the applicable intrusion detection and assessment power supply requirements of the VEGP Units 3 and 4 Physical Security Plan associated with 10 CFR 73.55(i).

The testing identified in Reference 3 involved securing the assigned normal power supply to Unit 3 intrusion detection and assessment equipment at the protected area perimeter and verifying that the protected area perimeter intrusion detection and assessment equipment remained powered from the credited uninterruptible power supply, such that the affected intrusion detection and assessment equipment remained operable.

The test results are documented in Reference 3 and verify that the intrusion detection and assessment equipment at the Unit 3 protected area perimeter remains operable from an uninterruptible power supply in the event of the loss of normal power.

References 1, 2 and 3 are available for NRC inspection as part of the Unit 3 ITAAC C.2.6.09.03b Completion Package (Reference 4).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there were no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC C.2.6.09.03b (Reference 4) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC C.2.6.09.03b was performed for VEGP Unit 3 and that the prescribed acceptance criteria were met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. SV3-SES-ITR-800661, Unit 3 ITAAC 661 Walkdown Inspection: ITAAC C.2.6.09.03b, Rev 0 (SRI)
2. SV3-SES-ITR-801661, Intrusion Detection/Video Assessment Testing: ITAAC C.2.6.09.03b, Rev 0 (SRI)
3. SV3-SES-ITR-802661, Uninterruptible Power Supply Testing: ITAAC C.2.6.09.03b, Rev 0 (SRI)
4. C.2.6.09.03b-U3-CP-Rev0, ITAAC Completion Package